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United Fresh Fruit &
Vegetable Association

September 26, 2005

U.S. Department of Agriculture
Agricultural Marketing Service, Fruit and Vegetable
Programs, Fresh Products Branch
1400 Independence Ave., SW.
Room 0640-S
Washington, DC 20250-0295

**RE: Revision of Fees for the Fresh Fruit and Vegetable Terminal
Market Inspection Services [Docket No. FV-04-310]**

To Whom It May Concern:

On behalf of the members of United Fresh Fruit & Vegetable Association (United), please accept the following comments on the proposed "Revision of Fees for the Fresh Fruit and Vegetable Terminal Market Inspection Services" published by the U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) in the *Federal Register* on August 25, 2005. Founded in 1904, United is the national trade association that represents the interests of growers, shippers, producers, wholesalers, distributors, brokers and processors of fresh fruits and vegetables. United has reviewed this proposed rule with its membership and believes it puts forward several issues that the AMS should consider before the rule is finalized.

USDA has proposed a fee revision for terminal market inspections whereby there will be increases of up to 15% on certain fees charged for the inspection of products at destination markets. United acknowledges and supports the obligations required under *Agriculture Marketing Act* law to maintain an four-month operating reserve above the projected annual program costs. United also understands that USDA continues to explore alternative funding streams and cost saving functions, which would allow for the Department to minimize this proposed fee increase and other increases that may be pursued in coming years. While we support this current fee proposal, United strongly encourages USDA to continue to explore other funding options before any additional fee increases are considered in subsequent years. The proposed fee increase comes at a time when there are significant difficulties within the industry including low commodity prices, high fuel costs and trucking shortages, regulatory compliance and recovery from disaster-related events. In addition, United and its members would also encourage USDA to continue to share with the industry a thorough explanation of the market inspection budget in order for the industry to understand the priorities and implementation of the user-fee funding for this important industry program. Further, it would be beneficial for USDA to discuss how the increased revenues generated from this fee increase will directly help the industry in the future.

United Fresh Fruit & Vegetable Association appreciates the opportunity to submit our comments and suggestions, and looks forward to answering any questions you may have.

Sincerely,

Robert L. Guenther
Vice President, Public Policy

